REMARKS

I. Introduction

In response to the Office Action dated August 23, 2004, claims 1, 9 and 17 have been amended. Claims 1-24 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

II. Prior Art Rejections

In paragraph (3) of the Office Action, claims 1-6, 9-14, and 17-22 were rejected under 35 U.S.C. §102(b) as being anticipated by Covington et al., U.S. Patent No. 5,524,193 (Covington). In paragraphs (4)-(5) of the Office Action, claims 7, 15, and 23 were rejected under 35 U.S.C. §103(a) as being unpatentable over Covington in view of Gupta et al., U.S. Patent No. 6,484,156 (Gupta). In paragraph (6) of the Office Action, claims 8, 16, and 24 were rejected under 35 U.S.C. §103(a) as being unpatentable over Covington in view of Chang et al., U.S. Patent No. 6,584,479 (Chang).

Applicant respectfully traverses these rejections.

Specifically, the independent claims were rejected as follows:

> In regard to independent claim 1, "(a) *obtaining a sequence of frames to be consecutively displayed on a display device, wherein a frame comprises one or more images*", as taught by '193 at col. 1, line 60 through col. 2; line 5 (i.e... that is a peace of ...audio or video clip) may be referred to a "media event" ...display under any topic of the computer base...video segment display...), also at col. 5, lines 25-30 (i.e.... on a color monitor...), "(b) *obtaining annotation information, wherein the annotation information comprises: (ii) an annotation,*", as taught by '193 at col. 4, lines 40-45 (i.e....annotated with text, video...); "*(i) an identification of a frame; and (iii) a location on the identified frame to display the annotation*", as taught by '193 at col. 9, line 50 through col. 10; line 30 (i.e....that is a peace of each reel is divided into a number of different partitions, call "frames" ...in FIG. 5, each of the Library reel, Clip Reel, and Event Reel are divided into six frames...if the event is graphic event...the bitmap, vector map... The Library, Clip and Event Reels 510, 520 and 530, respectively, provide a means for identifying and selecting individual or groups of events from among the thousands that may be available, for inspecting them, modifying them or creating new events, and for assembling a sequence of events that may be connected to a trigger) may be referred to a "media event" ...display under any topic of the computer base...video segment display...), "*(c) consecutively displaying one or more of the sequence of frames until the identified frame is displayed; (d) pausing the display of the sequence of frames when the identified frame is displayed*", as taught by '193 at col. 12, line 63 through col. 13, line 14 (i.e....Play button 820a to 820e allow user to scan the video...820c stop the play back...); "*(e) displaying the annotation at the location*", as taught by '193 at col. 2, lines 48-60 (i.e... provides to users (...the ability to create sequences of media events that are connected to and accessible from other media events, and the ability to change existing annotating sequences. The media events (e.g., a piece of text, an illustration, an audio or video clip, may be referred to as a "media event" or simply an "event") used in a given sequence may be selected from a library of media events, or may be created by a user from scratch or by modifying existing media events. Also, each media event used in the annotation sequence may itself be annotated...).
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> In regard to independent claim 9, is directed to an apparatus for performing the method of claim 1, and is similarly rejected along the same rationale.

In regard to independent claim 17, is directed to a computer readable medium for performing the method of claim 1, and is similarly rejected along the same rationale.

Applicant traverses the above rejections for one or more of the following reasons:

(1) Covington, Gupta, and Chang do not teach, disclose or suggest a computer program determining when a particular frame has been displayed;

(2) Covington, Gupta, and Chang do not teach, disclose or suggest a computer program automatically pausing the display of the sequence of frames at the particular frame; and

(3) Covington, Gupta, and Chang do not teach, disclose or suggest continuing to display the sequence of frames subsequent to the identified frame when a user elects to proceed.

Independent claims 1, 9, and 17 are generally directed to annotating a video clip/sequence of frames. A computer program obtains a video clip and annotation information that identifies a particular frame in the video clip, an annotation, and a location on the particular frame to display the annotation. The computer program proceeds to display the sequence of frames and then determines (automatically) when the particular frame is displayed at which point the program automatically pauses the display. The annotation is then displayed at the specified location. The video clip remains paused until the user elects to proceed at which point the sequence of frames then continues to display.

The cited references do not teach nor suggest these various elements of Applicant's independent claims.

Covington merely describes an invention providing an improved method for annotating a text document or other media event with any other media event or events. One aspect of Covington allows authors to quickly and easily, without the hard programming of the prior art, create a sequence of media events that are connected to a particular word or phrase in a text, a portion of a graphic illustration, or to an audio or video clip. The media events used in a sequence may be selected from a library of media events, or may be created by the user from scratch or by modifying existing media events. Another aspect of Covington allows a trigger, and the sequence of media events connected to that trigger, to be associated with a particular "filter". A "filter", as the term is used in Covington, is a particular grouping of triggers. Any desired number of filters and triggers may be created.

Thus, Covington merely provides the ability to annotate/organize a sequence of events. The Office Action relies on Fig. 5 and col. 9, line 50-col. 10, line 30 to teach various aspects of the claimed invention. This portion of Covington merely describes how a user can select and compile a sequence of different events that are connected to a particular trigger that a user can select. In other words, Covington specifically provides for displaying particular events only when a user selects a particular trigger from one of the displayed reels (see col. 9, line 33-col. 10, line 32). Thus, instead of the computer program automatically determining and pausing a video clip at a particular frame and displaying an annotation, Covington's FIG. 5 merely describes the ability for a user to set up and interact with various reels and by clicking on a particular frame within a reel, displaying a subsequent event. Such a teaching does not describe, suggest, or allude to, implicitly or explicitly, the capability to pause a video clip on a particular frame to display an annotation.

To teach the "pause" aspects of the claimed invention, the Office Action further relies on col. 12, line 63-col. 13, line 14. However, unlike the present invention, this portion of Covington merely allows a user to manually play and stop a sequence of frames. There is no capability for the computer program to automatically determine when a particularly identified frame has been reached and then automatically pause the display at that frame. Instead, Covington's explicitly states that the play buttons provide for normal and fast forward scanning of video on a storage media (see col. 12, line 66-col. 13, line 1). Such "normal" scanning is not even remotely similar to the determining and pausing performed by the present invention. Further, Covington completely fails to teach any "determining" step whatsoever.

In addition to the above, once the claimed video clip has been automatically paused and the annotation has been displayed, the amended claims provide that the video clip will continue displaying once the user has elected to proceed. Such a teaching is completely lacking from Covington and the other cited references.

In view of the above, Applicant submits that Covington fails to teach, disclose, or suggest, the invention as claimed. Further, the other references also fail to cure Covington's deficiencies. In this regard, Gupta merely mentions the use of XML. However, Gupta fails to teach, describe, or suggest, implicitly or explicitly, the capability to automatically pause a display of a video clip/stream at a particular frame, display an annotation at a particular location on the particular frame, and then continue displaying when the user elects to proceed. Instead, Gupta merely describes the ability to

annotate a presentation and the ability to specify a particular time range in the video clip during which an annotation is displayed (see col. 8, lines 10-37). In this regard, Gupta fails in at least one benefit of the present invention which allows the annotator to determine when a video clip is paused thereby allowing the viewer more time to read/view the annotation before proceeding (see page 10, lines 5-23 of the present specification). Thus, Gupta does not provide the capability for an automatic determination and pausing of a video clip at an annotated location (as claimed).

Applicant further submits that Chang also fails to cure the deficiencies of both Covington and Gupta. In this regard, Chang does not even remotely describe or suggest any of the above described claim limitations. Instead, Chang merely describes a primary body of data which is displayable on a screen and a supporting body of data is relatable to an annotation tag present in the primary body of textual data. An annotation tag having a predetermined size in the primary body of data is selected, and negotiations ensue between the primary body of data and the supporting body to determine a space into which the supporting body of data can be fitted while maintaining a substantially unobstructed view of the primary body of data. Generally, this negotiated space is sized larger than the original predetermined size of the annotation tag. An animation sequence is used to position the supporting body of data in the negotiated space. (See Abstract).

Moreover, the various elements of Applicant's claimed invention together provide operational advantages over Covington, Gupta, and Chang. In addition, Applicant's invention solves problems not recognized by Covington, Gupta, and Chang.

Thus, Applicant submits that independent claims 1, 9, and 17 are allowable over Covington, Gupta, and Chang. Further, dependent claims 2-8, 10-16, and 18-24 are submitted to be allowable over Covington, Gupta, and Chang in the same manner, because they are dependent on independent claims 1, 9, and 17, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2-8, 10-16, and 18-24 recite additional novel elements not shown by Covington, Gupta, and Chang.

III. Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicant's undersigned attorney.

Respectfully submitted,

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